

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION - CLEVELAND**

In re:

LAKE SHORE GAS STORAGE, INC.,

Debtor.

CASE NO. 17-17246

JUDGE ARTHUR I. HARRIS

In re:

CHOWDER GAS
STORAGE FACILITY LLC,

Debtor.

CASE NO. 17-17245

DEBTORS' WITHDRAWAL OF STIPULATIONS

Lake Shore Gas Storage, Inc. ("Lake Shore"), case number 17-17246, and Chowder Gas Storage Facility, LLC ("Chowder", with Lake Shore, collectively, the "Debtors"), case number 17-17245, hereby withdraw Stipulations filed July 23, 2018. Debtors' counsel filed the Stipulations with the understanding that they represented a statement of facts from the perspective of the Debtors, similar to what is commonly produced for a pretrial statement, not as a joint stipulation of facts. After speaking with counsel for the U.S. Trustee's Office and re-reading the Second Amended Evidentiary Hearing Scheduling Order, entered June 4, 2018, Debtors' counsel believes that her reading of the Scheduling Order may not be what was intended by the Court and withdraws the Stipulations.

Dated: July 24, 2018

Respectfully submitted,

/s/ Sherri L. Dahl

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